EXHIBIT "A"

Baker & Hostetler LLP

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Christa C. Turner

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

RICHARD E. WINTER REVOCABLE TRUST U/A DATED OCTOBER 30, 2002, ESTATE OF RICHARD E. WINTER, BELLA WINTER, in her capacity as the Personal Representative of the Estate of Richard E. Winter and as Successor Trustee to the Richard E. Winter Revocable Trust U/A dated October 30, 2002, and MARVIN

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04832 (SMB)

RAIZER, in his capacity as the Successor Trustee to the Richard E. Winter Revocable Trust U/A dated October 30, 2002,

Defendants.